

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

SUSAN C VINEYARD
301 East Oak Street
West Frankfort, Illinois 62896
618-932-3222 telephone

ORIGINAL

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CHIEF CLERK'S OFFICE

SUSAN VINEYARD

Complainant,

Docket # 04-0094

Vs

CENTRAL ILLINOIS PUBLIC SERVICE
COMPANY, dba AmerenCIPS,

Respondent.

MOTION TO COMPEL RESPONSE TO INTERROGATORY

NOW COMES Complainant SUSAN VINEYARD, hereinafter referred to as VINEYARD, and brings this Motion to Compel Response to Interrogatory previously submitted to Respondent AmerenCIPS, hereinafter referred to as AMEREN based upon the following facts:

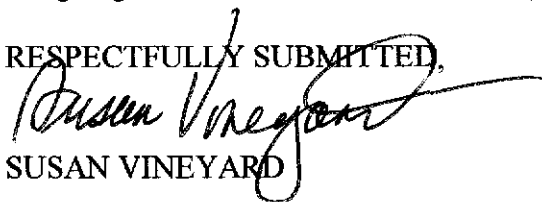
1. VINEYARD made application to AMEREN for energy services on or about May 14, 2002 by telephonic application.
2. AMEREN demanded that VINEYARD provide identification, which included proof of social security number, California Driver's License and US passport, all of which VINEYARD gave 100% compliance.
3. Andrew Graham of AMEREN informed VINEYARD that there were three energy statements, that bore the social security number of VINEYARD, that must be paid before energy services could be placed in my name.
4. VINEYARD informed Miss Graham that she had filed for bankruptcy protection in the northern district of California in Oakland, and the case number was 00-40267TR, but had not included the accounts she referenced because of lack of knowledge as to their existence.
5. Miss Graham told VINEYARD that she must pay the accounts or amend the bankruptcy schedule.
6. VINEYARD filed an amendment to the creditor list and sent the amendment by UPS OVERNIGHT, with an enclosed UPS OVERNIGHT enclosed and requested that the United States Bankruptcy Court in Oakland send a

conformed copy to AMEREN. Photocopies of those two UPS OVERNIGHT AIRBILLS are attached as Exhibit "A".

7. In a response to Interrogatories, AMEREN produced a copy of the May 14, 2002 worksheet that was completed by Miss Graham that indicated my energy service application had been approved. See photocopy of the AMEREN worksheet attached as Exhibit "C".
8. However, AMEREN, notwithstanding the energy service application approval, failed to place the service in the name of SUSAN VINEYARD.
9. In September 2003, AMEREN disconnected the energy service at 301 East Oak Street in West Frankfort, Illinois, and claimed that AMEREN had received an anonymous telephone call that stated there was fraudulent activity at the location, notwithstanding that AMEREN did not call, write or otherwise communicate with VINEYARD regarding the anonymous allegation.
10. VINEYARD finds it very difficult to understand how an energy service provider can fail to place service in the name of an approved applicant and then disconnect service by an anonymous telephone call without giving the approved applicant an opportunity to respond.
11. AMEREN has made false statements in their Response to Interrogatories and is making moves to avoid the production of their records that VINEYARD needs to prove her Complaint.
12. On point, VINEYARD requests that this Court order AMEREN to provide the name, address, telephone number of the anonymous informant and to provide copies of any correspondence sent to VINEYARD regarding Notice to VINEYARD of suspected fraudulent activity.
13. In addition, VINEYARD requests that this Court order AMEREN to provide a written explanation as to why energy service was not placed in the name of VINEYARD upon approval of her May 14, 2002 application.

I declare, under the penalty of perjury, under the laws of the State of Illinois, that the foregoing statements are true and correct, and can testify if called as a witness.

RESPECTFULLY SUBMITTED,



SUSAN VINEYARD

Ameren.motion to compel.sv/wf/hp/

Email to Eliott Hedin, attorney for AMEREN July 7, 2004 at 12:28 p.m. CDT